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PIZZA ASIA VENTURES, INC.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

v.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING,  
LLC, a Delaware limited liability  
company; GUY KOREN, an individual;  
POTATO CORNER LA GROUP, LLC,  
a California limited liability company;  
NKM CAPITAL GROUP, LLC, a  
California limited liability company; J &  
K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California  
limited liability company; J&K  
VALLEY FAIR, LLC, a California  
limited liability company; J & K  
ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS,  
LLC, a California, limited liability  
company; GK CERRITOS, LLC, a  
California, limited liability company;  
J&K PC TRUCKS, LLC, a California  
limited liability company; and, GK  
CAPITAL GROUP, LLC, a California  
limited liability company and DOES 1  
through 100, inclusive,

Defendants.

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld*

**NOTICE OF FILING DKT 165  
VOLUME II OF  
CORRESPONDENCE  
REQUESTED PURSUANT TO  
DKT. 155 (EXHIBITS 29  
THROUGH 50); DECLARATION  
OF MICHAEL MURPHY**

Complaint Filed: May 31, 2024  
Trial Date: August 4, 2025

1 PCJV USA, LLC, a Delaware limited  
2 liability company; PCI TRADING LLC,  
3 a Delaware limited liability company;  
4 POTATO CORNER LA GROUP LLC,  
5 a California limited liability company;  
6 GK CAPITAL GROUP, LLC, a  
7 California limited liability company;  
8 NKM CAPITAL GROUP LLC, a  
9 California limited liability company; and  
10 GUY KOREN, an individual,

11 Counter-Claimants,

12 v.

13 SHAKEY'S PIZZA ASIA VENTURES,  
14 INC, a Philippines corporation,

15 Counter Defendant.

16 PCJV USA, LLC, a Delaware limited  
17 liability company; PCI TRADING LLC,  
18 a Delaware limited liability company;  
19 POTATO CORNER LA GROUP LLC,  
20 a California limited liability company;  
21 GK CAPITAL GROUP, LLC, a  
22 California limited liability company;  
23 NKM CAPITAL GROUP LLC, a  
24 California limited liability company; and  
25 GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.

28 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a  
California corporation; CINCO  
CORPORATION, a Philippines  
corporation; and DOES 1 through 10,  
inclusive,

Third Party Defendants.

**NOTICE**

Please take notice that on April 22, 2025, Plaintiff Shakey's Pizza Asia Ventures, Inc. filed with this Court, Exhibits 29 through 51, that are responsive to this Court's Order on April 15, 2025 (Dkt. 155.) As explained in ¶¶ 13-16 of the Declaration of Michael Murphy attached to the Joint Statement (Dkt. 165) filed on April 21, 2025 (Dkt 165, less than an hour ago), at 8:50, when the fifty exhibits began to be filed with PACER, unknown errors began occurring immediately.

Five staff members from Fox, from across the country, were on the phone and emailing, and video conferencing in, attempting to solve the problem.

Specifically, the problem, as I observed, is as follows: After adding each pdf'd exhibits and submitting the filing, ECF rejected one of the first exhibits. The error said, "file may contain codes or be malformed," often indicates a problem with the file's structure or content, potentially leading to errors when the file is used or processed. This can be caused by various factors, including file corruption, encoding issues, or the presence of unexpected code or formatting within the file. After fixing the first exhibit that had the issue all exhibits had to be reuploaded individually and resubmitted just for the system to say another exhibit had an error. To make matters worse, when one of these issues would arise with later exhibits, all uploaded exhibits would be rejected in their entirety, forcing us to start over.

To attempt to resolve the issue we began to manually print all the exhibits and re-scan them, rename them, perform an OCR, and then re-file. The problem started again at Exh. 29, at which point it was decided to file the first twenty-eight exhibits with the Joint Statement, and file the remainder as soon as possible.

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1 Dated: April 22, 2025

**FOX ROTHSCHILD LLP**

2  
3 /s/ Michael D. Murphy

4 Michael D. Murphy  
5 Jordan Zollicoffer  
6 Attorneys for Plaintiff  
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**DECLARATION OF MICHAEL MURPHY**

I, Michael D. Murphy, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am a partner with Fox Rothschild LLP, attorneys of record for Plaintiff Shakey's Pizza Asia Ventures, Inc. ("SPAVI"), as well as the newly named Third-Party Defendants: Cinco Corporation, PC International PTE Ltd, and SPAVI International USA, Inc.

2. I have personal knowledge of the facts set forth herein, except for those stated on information and belief and, as to those, I am informed and believe that they are true.

3. I submit this declaration in support of Plaintiff's Notice of Filing Dkt 165, Volume II of Correspondence Requested Pursuant to Dkt. 155 (Exhibits 19-50.)

4. The preparation the Joint Statement was a time consuming exercise, given that, between Tuesday, April 15, 2025, in the afternoon, through Friday, and then today, Mr. Beral and I had to meet and confer, by at least video, select and secure a Special Master, propose the terms of that Special Master appointment, and then gather, and file, all correspondence relevant to the OSC. We accomplished all of this, as, indeed, even our exhibits were ready to file by 3 pm hour. After Mr. Beral and I thoroughly discussed, proposed, and revised, the joint statement, it was ready to file at 8:50 on April 21, 2025, just a few hours ago, all after resolving the issues as to who would be the Special Master and the scope of the appointment, as requested.

5. At 8:50 tonight, on April 21, 2025, when the fifty exhibits began to be filed with PACER, unknown errors began occurring immediately. I immediately ran to where the documents were being filed, and within 30 minutes, we had five staff members of Fox Rothschild, from across the country, on the phone and emailing, attempting to solve the problem. One even drove to the office in person.

1           6.       Specifically, I am informed and believe and thereon state that the  
2 problem was as follows: After adding each pdf'd exhibit and submitting the filing,  
3 ECF rejected one of the first exhibits. The error said, "file may contain codes or be  
4 malformed," which, I am also informed and believe, often indicates a problem with  
5 the file's structure or content, potentially leading to errors when the file is used or  
6 processed. This can be caused by various factors, including file corruption,  
7 encoding issues, or the presence of unexpected code or formatting within the file.

8           7.       After a staff member fixed the first exhibit that had the issue, all  
9 exhibits had to be reuploaded individually and resubmitted just for the system to  
10 say another exhibit had an error.

11           8.       To make matters worse, when one of these issues would arise with  
12 later exhibits, all uploaded exhibits would be rejected in their entirety, forcing us to  
13 start over. We started over so many times we lost count between 8:40 and `11:40.

14           9.       To attempt to resolve the issue my staff, I am informed, began to  
15 manually print all the exhibits and re-scan them, rename them, OCR the document,  
16 and then re-file. The problem started again at Exh. 29, at which point it was decided  
17 to file the first twenty-eight exhibits with the Joint Statement (Dkt. 165) and file the  
18 remainder as soon as possible.

19           10.      As this Court can imagine, this has been upsetting to me personally,  
20 given what has transpired over the last few weeks. Should this Court request any  
21 further information as to what transpired, causing these 22 Exhibits to be filed 55  
22 minutes after the main filing, and after midnight, I will appear and answer whatever  
23 questions this Court asks.

24           11.      I will ask for the Court's consideration of the following. Prior to my  
25 arrival at Fox, while at Ervin, Cohen & Jessup, I was not late with any filing, and  
26 fully compliant with the Rules. I believe these are growing pains in a new firm, and  
27 am taking ever effort possible to ensure this does not happen again.

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1 I declare under penalty of perjury that the foregoing is true and correct. Executed  
2 April 22, 2025, within the United States, its territories, possessions, or  
3 commonwealths.

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5 /s/ Michael D. Murphy  
6 Michael Murphy  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that, on April 22, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF user and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 22, 2025

**FOX ROTHSCHILD LLP**

/s/ Michael D. Murphy

Michael D. Murphy  
Attorneys for Plaintiff SHAKEY'S  
PIZZA ASIA VENTURES, INC.